

## **EXHIBIT 15**

### **Excerpts from Deposition Transcript Vol. I of Abigail Panter**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
CIVIL ACTION NO. 1:14-CV-00954-LCB-JLW

STUDENTS FOR FAIR  
ADMISSIONS, INC.,

Plaintiffs,

vs.

UNIVERSITY OF NORTH  
CAROLINA, et al.,

Defendants.

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AMENDED DEPOSITION  
OF  
ABIGAIL PANTER

THIS DEPOSITION CONTAINS HIGHLY CONFIDENTIAL AND  
PROPRIETARY INFORMATION AND IS SUBJECT TO A PROTECTIVE  
ORDER RESTRICTING PUBLIC DISCLOSURE OF ITS CONTENTS

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TAKEN AT THE OFFICES OF:  
UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL  
110 Bynum Hall  
222 East Cameron Avenue  
Chapel Hill, NC 27514

06-19-17  
9:08 A.M.

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1 about the Provost Dean?

2 A. "Provost Dean said that the University  
3 is obligated by law to consider alternatives to  
4 any use of race or ethnicity in its admissions  
5 policies and practices. He also said that the  
6 University is obligated both legally and as a  
7 matter of sound practice to assess, measure, and  
8 improve its delivery of educational benefits to  
9 its students, including the educational benefits  
10 of diversity."

11 Q. Thanks. How does UNC assess and measure  
12 its delivery of educational benefits to its  
13 students including the educational benefits of  
14 diversity?

15 A. Well, first off all, the student body  
16 diversity is critical to our mission for the  
17 University as I've mentioned before, since we're a  
18 center for scholarship and research and creativity  
19 and we teach undergraduates, graduate students,  
20 and professional students.

21 Having a diverse student body allows us  
22 to have discussions of students together talking  
23 about issues, thinking about different  
24 perspectives and -- and improves our learning  
25 outcomes. And as such we look at our learning

1           outcomes in a lot of different ways.

2           We have a process where we examine  
3           regularly our student learning outcomes of our  
4           University at regular points, including  
5           examination of whether the benefits of -- of  
6           racial -- of racial and student diversity at the  
7           University. So at -- for example, at the  
8           undergraduate level we have surveys. We -- that  
9           are asked regularly that cover aspects of the  
10          benefits of diversity.

11          We also talk to our students regularly  
12          about -- about their experiences and about -- and  
13          whether they're being supported and how their  
14          academic careers are going. We talk to them in  
15          advising. We talk to them in our student support  
16          areas and we are talking to students regularly.

17          My own research also involves talking to  
18          students regularly about their paths through  
19          Carolina, in their transitions coming to UNC, in  
20          their career while here and their experiences and  
21          as they approach graduate school or post-graduate  
22          opportunities.

23          Q.    Okay. So I have a couple questions  
24          about that. You mentioned that this -- that UNC  
25          examines student learning outcomes. What do you

1 mean by that?

2 A. I mean that we have expectations and --  
3 that our students will gain something while  
4 they're here in many different areas. So we have,  
5 for example, a general education curriculum that  
6 all of our undergraduate students are engaged with  
7 while they're here and there are certain aspects  
8 to that so we look, for example, they have to have  
9 quantitative reasoning and they have to have  
10 certain -- they have to have writing and they have  
11 to have certain foreign language competency and  
12 other areas. And one of them that we look at is  
13 around whether students gain something from having  
14 a diverse environment.

15 Q. And how do you evaluate whether the  
16 students have gained something from having a  
17 diverse environment?

18 A. Well, usually there are many different  
19 methods so it's important to triangulate and use  
20 different kinds of assessments to look at these  
21 kinds of questions, which is why we use surveys  
22 and we talk to students and we do a lot of kinds  
23 of ways to get at the question about what students  
24 are gaining from this experience.

25 But surveys get -- surveys have

1 information about students when they came in, what  
2 -- what their understanding was of race and  
3 ethnicity and what it is now as they're graduating  
4 and those changes. We see that in -- we have  
5 software surveys as well that do that so we have  
6 certain surveys that we regularly ask that get at  
7 those kinds of questions.

8 Q. Okay. And so what -- what do those  
9 surveys ask?

10 A. They ask a series of questions, some of  
11 which involve the question that's here about  
12 student body diversity and they ask in different  
13 areas, when you came in, about your understanding  
14 of race and ethnicity, your understanding of  
15 gender, your understanding of other -- other areas  
16 and what is your understanding now and how is --  
17 really how has the University improved your  
18 understanding of these areas?

19 Q. Okay. And ---

20 A. That's called an indirect way of  
21 assessing student body diversity.

22 Q. Okay. And you said this is done by  
23 surveys?

24 A. Yes, those are some surveys.

25 Q. And who conducts these surveys?